



GROSSMAN LLP
ATTORNEYS AT LAW

745 Fifth Avenue, 5th Floor, New York, NY 10151

T. 646-770-7445 F. 646-417-7997

GROSSMANLLP.COM

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VIA ECF

Hon. George B. Daniels
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 11A
New York, New York 10007

**Re: *Athena Art Finance v. Certain Artwork by Jean-Michel Basquiat, in Rem,*
Case No. 20 Civ. 4669 (GBD)**
Request for Pre-Motion Discovery Conference

Dear Judge Daniels,

We write on behalf of Intervenor-Plaintiff Satfinance Investment Limited (“SIL”) under the Court’s Individual Rule IV.A and Local Rule 37.2 to respectfully request a pre-motion conference to address Plaintiff Athena’s continuing discovery default and to seek an Order compelling Athena’s immediate compliance with SIL’s document requests.

The January 27, 2021, Civil Management Case Plan and Scheduling Order (Dkt. No. 52) required all parties to provide written responses and responsive documents in response to the first set of document requests by March 22. One business day before that deadline, Athena requested a several-day adjournment to finalize its review, and as a courtesy, SIL consented. Yet nearly one month later, despite repeated assurances, Athena has not provided any written responses or produced a single document.

SIL respectfully submits that the Court should compel Athena’s immediate production of all responsive documents, Athena having waived any objections, on privilege or other grounds, as a result of Athena’s default and the attendant delay that it has caused. *See Cohalan v. Genie Indus., Inc.*, 276 F.R.D. 161, 164 (S.D.N.Y. 2011) (“A failure to respond or object to a discovery request in a timely manner waives any objection which may have been available.”).

Respectfully submitted,

A handwritten signature in blue ink that reads "Judd Grossman".

Judd B. Grossman

cc: All counsel (via ECF)